

**UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA**

<b>UNITED STATES OF AMERICA</b>	:	
	:	<b>05-187 (ESH)</b>
<b>v.</b>	:	
	:	
<b>MARCUS CALLAHAM</b>	:	
<hr/>	:	

**MOTION FOR REVIEW OF DETENTION ORDER**

Marcus Callaham, through undersigned counsel, respectfully moves this Honorable Court for a modification of the order holding Mr. Callaham without bond in this matter, and requests that he be placed in the Pretrial Services Heightened Intensity Program or alternatively, in a halfway house, pending sentencing in this matter. As grounds for this motion, Mr. Callaham, through counsel, states:

1. Counsel has been in contact with Ms. Kimberlee Watson who supervised Mr. Callaham at DC Pretrial Services. Counsel informed Ms. Watson that Mr. Callaham had been stepped back by the Court. She indicated to counsel that she would not oppose Mr. Callaham staying on release pending sentencing given his perfect compliance in this matter with his conditions.

2. If the Court is not willing to reconsider detention in this matter, counsel requests that this Court order his detention at the CCA Correctional Treatment Facility. Mr. Callaham has asthma and is having considerable problems with breathing at DC Jail.

**WHEREFORE** for the foregoing reasons, any which may appear at a full hearing on this matter, and any others this Court deems just and proper, Marcus Callaham, through counsel, respectfully requests that he be released into the Heightened Intensity Program of the Pretrial Services Agency or, alternatively, released to the third party custody of the Department of Corrections, for placement in a halfway house.

Respectfully submitted,

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JENIFER WICKS  
Bar No. 465476

Law Offices of Jenifer Wicks  
The Webster Building  
503 D Street, N.W.  
Suite 250A  
Washington, D.C. 20001  
(202) 326-7100